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VIA ECF

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The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12C
New York, New York 10007-1312

Re: *McGucken v. Shutterstock, Inc., et al.*, No. 1:22-cv-00905-GHW

Dear Judge Woods:

This firm represents defendant Shutterstock, Inc. (“Shutterstock”) in connection with the above-captioned action. Pursuant to Your Honor’s Order (Dkt. No. 8) and Rule 1.E of Your Honor’s Individual Rules of Practice in Civil Cases, we write to request an adjournment of the initial pretrial conference, scheduled for April 7, 2022 at 4:30 p.m.

Under the Court’s current schedule, Shutterstock’s answer to Plaintiff’s complaint (Dkt. No. 1) (the “Answer”) is due April 11, 2022, resulting from a waiver of service under Fed. R. Civ. P. 4. Because the contents of the Answer, including defenses and potential counterclaims, may change what each party chooses to discuss during the initial pretrial conference, having the conference before the Answer is due prevents the conference from being as complete as it could be. Accordingly, Shutterstock respectfully requests to have the date of the conference adjourned to any of the following dates, on which counsel for both sides is available: April 21, 2022, or April 25–April 29, 2022.

This is the first request for an adjournment or extension of time by any party in this action. This request is made on consent of all parties.

We thank the Court for its attention to this matter.

Respectfully submitted,

Eleanor M. Lackman

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Defendant's request to adjourn the pre-trial conference in this case is denied.

SO ORDERED.

Dated: March 28, 2022
New York, New York

GREGORY H. WOODS
United States District Judge